

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

REX DALE RAINS II,

Defendant.

No. 15cr 30053 DRH

Title 16, United States Code,  
Sections 3372(a)(2)(A)  
and 3372(d)(2)  
Class A Misdemeanor

**FILED**

**APR 16 2015**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1 - Wildlife Trafficking – June 2012**

On or about June 12, 2012, in Vandalia, Fayette County and elsewhere, within the Southern District of Illinois, the defendant,

**REX DALE RAINS II,**

did knowingly import, transport and sell live wildlife, in interstate commerce, knowing that the wildlife was transported and sold in violation of the laws and regulations of the State of Illinois, specifically, 515 Illinois Compiled Statutes (ILCS) 5/10-100 – “Release of Aquatic Life,” and, in the exercise of due care, should have known that the wildlife were transported in violation of law. Specifically, the Defendant traveled in interstate commerce from the State of Alabama to Vandalia, Fayette County, Illinois to sell blue tilapia on or about June 12, 2012. All in violation of Title 16, United States Code, Sections 3372(a)(2)(A) and 3373(d)(2).

**COUNT 2 – False Labeling – June 2012**

On or about June 12, 2012, in Vandalia, Fayette County and elsewhere, within the Southern District of Illinois, the defendant,

**REX DALE RAINS II,**

did knowingly submit any false record, account, or label for, or any false identification of, fish which has been, or intended to be, transported in interstate commerce. Specifically, on or about June 12, 2012, the Defendant knowingly issued a sales receipt to a buyer for the purchase of blue tilapia, which falsely identified blue tilapia as blue gill. All in violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(B).

**COUNT 3 - Wildlife Trafficking – June 2013**

On or about June 22, 2013, in Ramsey, Fayette County and elsewhere, within the Southern District of Illinois, the defendant,

**REX DALE RAINS II,**

did knowingly import, transport and sell live wildlife, in interstate commerce, knowing that the wildlife was transported and sold in violation of the laws and regulations of the State of Illinois, specifically, 515 Illinois Compiled Statutes (ILCS) 5/10-100 – “Release of Aquatic Life,” and, in the exercise of due care, should have known that the wildlife were transported in violation of law. Specifically, the Defendant traveled in interstate commerce from the State of Alabama to Vandalia, Fayette County, Illinois to sell blue tilapia on or about June 22, 2013. All in violation of Title 16, United States Code, Sections 3372(a)(2)(A) and 3373(d)(2).


**COUNT 4 – False Labeling – June 2013**

On or about June 22, 2013, in Ramsey, Fayette County and elsewhere, within the Southern District of Illinois, the defendant,

**REX DALE RAINS II,**

did knowingly submit any false record, account, or liable for, or any false identification of, fish which has been, or intended to be, transported in interstate commerce. Specifically, on or about June 22, 2013, the Defendant knowingly issued a sales receipt to a buyer for the purchase of blue tilapia, which falsely identified the blue tilapia as blue gill. All in violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(B).

UNITED STATES OF AMERICA

  
STEPHEN R. WIGGINTON  
United States Attorney

  
WILLIAM E. COONAN  
Assistant United States Attorney